

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ALBERT BARNES,

Plaintiff,

vs.

GIRLS GALORE, INC. d/b/a BLISS

ATLANTA et al.,

Defendants.

Civil Action No. 1:14-CV-3946-SCJ

**PLAINTIFF’S EMERGENCY MOTION FOR AN ORDER PROHIBITING SPOILIATION
AND PRESERVING EVIDENCE AND REQUEST FOR EXPEDITED BRIEFING**

Based on a clear danger of evidentiary spoliation in this case, Plaintiff Barnes hereby seeks an immediate order prohibiting Defendants Girls Galore, Inc. d/b/a Bliss Atlanta, George Nazerian, and Nicholas Stergion (“Defendants”) from destroying critical evidence relating to Plaintiff’s employment by Defendants, as well as Defendants’ revenues for the years 2010 through 2014. In support of this Motion, Plaintiff submits the accompanying Brief in Support, and the Declaration of Andrew J. Holland, former General Manager of Tease, which is the current trade name of Defendant Girls Galore, Inc.

I hereby certify pursuant to LR 7.1 that the foregoing document has been prepared in Times New Roman 14 point font, which is one of the font and point selections approved by the court in LR 5.1C.

Respectfully submitted,

**DELONG CALDWELL BRIDGERS
& FITZPATRICK, LLC**

/s/ Kevin D. Fitzpatrick, Jr.
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COUNSEL FOR PLAINTIFFS

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CERTIFICATE OF SERVICE

I further certify that on this day I filed the accompany PLAINTIFF'S
EMERGENCY MOTION FOR AN ORDER PROHIBITING SPOLIATION AND
PRESERVING EVIDENCE AND REQUEST FOR EXPEDITED BRIEFING in
the Court's CM/ECF system, thereby ensuring delivery by electronic mail upon all
counsel of record.

This 30th day of March 2015.

/s/ Matthew W. Herrington

Matthew W. Herrington
Georgia Bar No. 275411